REMARKS

This application has been reviewed in light of the Office Action dated

December 23, 2005. Claims 14-20 are presented for examination, of which Claims 14, 19, and

20 are in independent form. Claims 1-13 have been canceled, without prejudice or disclaimer of

subject matter. Claims 14-20 have been added to provide Applicant with a more complete scope

of protection. Favorable reconsideration is requested.

Claims 1, 3, 8, and 11 have been rejected under 35 U.S.C. § 102(b) as being

anticipated by U.S. Patent 5,732,149 (*Kido et al.*); Claim 2 has been rejected under 35 U.S.C.

§ 103(a) as being unpatentable over *Kido et al.* in view of U.S. Patent 5,982,848 (*Friedrich et

al.*); and Claims 4-7, 9, 10, 12, and 13 have been rejected under Section 103(a) as being

unpatentable over *Kido et al.* in view of U.S. Patent 5,854,851 (*Bamberger et al.*).

Cancellation of Claims 1-13 renders their rejections moot. Applicant submits

the following comments regarding the patentability of new Claims 14-20 over these cited

references.

The aspect of the present invention set forth in Claim 14 is an image

processing method for executing a gray scale conversion process on an original image. The

method includes calculating a parameter for determining a gray scale conversion processing

method from the original image as a first feature amount value, calculating a parameter for

determining the gray scale conversion processing method from the original image as a second

feature amount value, and selecting, based on the first feature amount value and the second

feature amount value, either the first feature amount value or the second feature amount value.

The method also includes executing the gray scale conversion process on the original image

based on the selected feature amount value. The first calculation step uses a first calculation

method which is different from a second calculation method used in the second calculation step.

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That is, parameters (plural feature amount values) for determining a gray scale conversion processing method are calculated using different calculation methods., and a feature amount value that is to be used in the actual gray scale conversion process is selected from among the plural feature amount values. Thus, according to the present invention, as defined by Claim 14, it is possible to use an optimum feature amount value, calculated based on plural algorithms, allowing optimum image processing such that the gray scale conversion process becomes more stable.

Applicant submits that none of the cited prior art, *Kido et al.*, *Friedrich et al.*, and *Bamberger et al.*, teach or suggest the features of Claim 14, and in particular calculating a parameter for determining a gray scale conversion processing method from the original image as a first feature amount value, calculating a parameter for determining the gray scale conversion processing method from the original image as a second feature amount value, and selecting, based on the first feature amount value and the second feature amount value, either the first feature amount value or the second feature amount value.

For at least this reason, Applicant submits that Claim 14 is allowable over the cited prior art.

Independent Claims 19 and 20 are apparatus and computer-readable storage medium claims respectively corresponding to method Claim 14, and are believed to be patentable over the cited prior art for at least the same reasons as discussed above in connection with Claim 14.
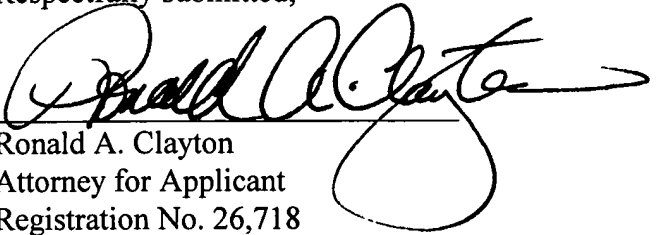
The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the

invention, however, the individual consideration of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicants respectfully request favorable reconsideration and early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

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